

Cognizant is committed to participating in the political and public policy process in a responsible and ethical way that serves the best interests of our shareholders, employees, customers, and the communities in which we operate. All political, lobbying and civic activity by the Company and its employees must comply with this Policy, Cognizant's Core Values and Code of Ethics and applicable law.

## Public Policy Priorities

Cognizant works with governments, others in its industry, the broader business community and civil society for public policies that support the Company's business goals.

## Corporate Political Contributions

All corporate contributions are made to promote the interests of the Company and its public policy priorities and without regard for the personal political preferences or agendas of individual officers, directors or employees. No campaign contribution will be given in violation of law. In accordance with U.S. federal election law, Cognizant does not use corporate funds for political contributions to federal candidates, national political parties or committees of such parties. Cognizant may make political contributions, including at the state or local level, where permitted by law. Cognizant discloses its U.S. corporate contributions as part of its semi-annual Political Spend Reports posted to its website.

## Lobbying

From time to time Cognizant engages in discussions with all levels of governments on public policy issues. When it is determined to be in the best interest of the Company, Cognizant works with governments to provide information and perspective that support its point of view, through its lobbyists and grassroots lobbying communications. The Company discloses its U.S. federal, state and local lobbying activity and expenditures as required by law. For convenience, the Company provides links to its reports filed pursuant to the Lobbying Disclosure Act on its website.

## Trade Associations

The Company participates in trade associations for a variety of reasons. Company participation in trade associations, including membership on a trade association board, does not mean that the Company agrees with every position a trade association may take. From time to time trade associations in which the Company participates may take positions that differ from those of the Company.

The Company makes payments to the trade associations in which it participates, including membership fees and dues. Cognizant discloses in its Political Spend Reports the identity of and dues paid to U.S. trade associations to which Cognizant has paid annual dues of \$50,000 or more. The Company asks these trade associations what portion of the Company's payments were used for non-deductible lobbying expenditures under Section 162(e) of the Internal Revenue Code and, where provided, discloses such percentage in its Political Spend Reports and in its reports pursuant to the Lobbying Disclosure Act as required by law.

## Cognizant Political Action Committee

In the United States, Cognizant maintains a non-partisan political action committee ("PAC") that is registered with the Federal Election Commission ("FEC"). The PAC makes federal political contributions on a bipartisan basis to political parties, political committees and candidates who share the values and goals of the Company and its employees. The contributions made by the PAC are not

funded by corporate funds and are funded entirely on a voluntary basis by eligible Cognizant employees.

The PAC complies with all applicable laws concerning political contributions, including laws requiring public disclosure of such contributions. All contributions made by the PAC are reported in filings with the FEC and are publicly available on the commission's website (<http://www.fec.gov>). For convenience, the Company also provides an annual report of PAC contributions on its website.

### **Individual Employee Political and Civic Activity**

Cognizant encourages its employees to be informed about public policy issues and participate in the political process on an individual basis compliant with the Company's Core Values and Code of Ethics. Consistent with applicable law, the Company will not take any adverse employment action against an employee based on his or her personal affiliation or lawful political activity.

### **Compliance and Oversight**

The Nominating, Governance and Public Affairs Committee of the Cognizant Board of Directors is responsible for overseeing the Company's public affairs and public policy initiatives, reviewing on an annual basis the Company's policies, activities and expenditures with respect to political contributions (including to trade associations and other tax-exempt and similar organizations that may engage in political activity), and setting and approving any changes to the Company's annual political contribution budget. The committee receives periodic updates from the Company's General Counsel and Chief Corporate Affairs Officer, who is responsible for the Company's public affairs and public policy activities and expenditures worldwide and reports directly to the Company's Chief Executive Officer. The committee also approves the Company's Political Spend Report that is posted to the Company's website semi-annually.

The Company's participation in the U.S. political process is managed by the Company's head of U.S. Government Affairs, who reports directly to the Company's General Counsel and Chief Corporate Affairs Officer. Political contributions in the U.S. are proposed by the U.S. Government Affairs team and approved by the Company's General Counsel and Chief Corporate Affairs Officer.

The Cognizant PAC and all PAC activities (including solicitation of voluntary contributions to the PAC from eligible Cognizant employees and contributions by the PAC to parties and candidates) are managed by the General Counsel and Chief Corporate Affairs Officer and the U.S. Government Affairs team.

*Adopted by the Board of Directors on September 16, 2019*